

STATE OF COLORADO

Roy Romer, Governor
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Dedicated to protecting and improving the health and environment of the people of Colorado

HAZARDOUS MATERIALS AND WASTE MANAGEMENT DIVISION

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Colorado Department
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RE: Comments of the Draft Building 771/774 Closure Project Decommissioning Operations Plan (DOP)

Dear Mr Rampe and Ms Sarter

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the Division), has reviewed Building 771/774 Closure Project DOP (Revision 0 dated September 3, 1998) Enclosed are our comments

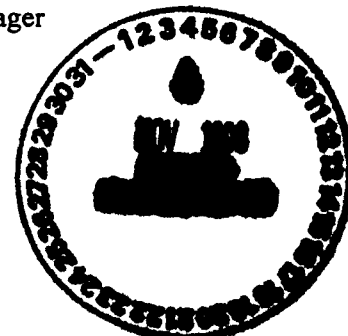
If you have any questions regarding these comments, please contact Chris Gilbreath at (303) 692-3371

Sincerely,

Steven H Gunderson
RFCA Project Coordinator

Chris S Gilbreath
Building 771/771 Project Manager

cc D Miller, AGO
G Meyer, Kaiser-Hill
S Tarlton, CPDHE



ADMIN RECORD
IA-8771-A-00008

Building 771 Decommissioning Operations Plan (Revision 0 - 9/3/98) Comments

<u>Comment #</u>	<u>Section</u>	<u>Comment</u>
1	General	<p>The DOP does not adequately describe the detailed technical approach to decommission areas/rooms of Building 771. Instead, according to the DOP, the detailed technical approach will be developed and approved in accordance with the "Integrated Work Control Process." As stated on page 4-9 of the DOP, "the IWCP contains detailed instructions for performing work on-Site and contains specific controls and requirements to ensure protection of the workers, public, and the environment." According to Appendix 5 to the DOP, it appears that the actual instructions would be contained in documents called "work packages."</p> <p>Information describing instructions for performing work so as to protect workers, public health and the environment should be in the DOP. CDPHE recognizes that it is not possible to identify this information for the 82 different worksets included in the decommissioning of Building 771 at this time. However, CDPHE needs an opportunity to review and approve these work procedures before allowing work to begin. Last November 1997, DOE and CDPHE agreed that additional details would be provided in subsequent documents that would be processed as modifications to the DOP under RFCA Part 10. CDPHE acknowledges that this approach could prove overly burdensome, given the large number of work packages at issue. CDPHE believes that an opportunity to review work packages, followed by participation in the work package roundtable discussions, will provide an adequate level of oversight. Therefore, without waiving any rights to require that information describing instructions for performing work so as to protect workers, public health and the environment be processed as modifications under RFCA should such an approach become necessary in the future, CDPHE requires that the DOP be revised to include the following statement in the first paragraph of 4.5: "DOE will submit draft work packages (see Appendix 5) to CDPHE as they are developed. CDPHE will participate in the work package roundtable discussions (see Appendix 5) that occur prior to implementing a given work package. DOE recognizes that CDPHE may utilize its stop work authority under RFCA if it does not concur with the work package."</p>
2	1 - Intro	Revise the first sentence in the second paragraph to read "The scope of this DOP includes decommissioning activities but does not currently address final building demolition."
3	1 - Intro	If internal demolition may be conducted as part of this DOP, those activities must be clearly identified for the applicable set(s) along with the endpoints, characterization requirements and hazards for the activity (Appendix 9).
4	2	It appears that cluster buildings associated with Bldg 771/774 are included as sets #77, 81 and 82. To date, Reconnaissance Level Characterization Reports have not been completed for these buildings. At a minimum, Appendix 9 should be modified to include necessary end points for completing work for each of these sets (e.g., perform RLC, typing of the building, develop demolition plan, develop monitoring plan, etc.). In the event some or all of the cluster buildings are classified as Type 1, the Decommissioning Program Plan should dictate future requirements. If however, any of the buildings are designated as Type 2, then this DOP must adequately describe the

necessary activities associated with decommissioning the building (e g ,
decontamination, demolition, monitoring, etc)

- 5 4 4 "The NCP requires EPA approval of sampling and analysis plans developed in accordance with section 300 415(b)(4) of the NCP " The referenced NCP provision applies to all environmental samples Between the NCP and the EPA/DOE MOU on Decommissioning, the LRA has the authority/obligation to review and approve all sampling plans and procedures under D&D The DOP must be revised to reflect the fact that the LRA has such authority Specifically for work authorization documents to be developed for chemical characterization (i e , lead, PCBs and Beryllium) and radiological characterization (i e , final building survey), the DOP must clearly identify these documents as sampling and analysis plans under CERCLA For in-process characterization, radiological surveys and monitoring plans, these documents will be developed in accordance with the appropriate referenced requirements and reviewed per the IWCP Development Process (Appendix 5)
- 6 4 4 This section identifies the DQO process for characterization activities Has RFETS developed a building-specific or site-wide guidance document for implementing the DQO process? Provide a copy of this document
- 7 4 4 Reconnaissance Level Characterization - Revise this section to more clearly state that the RLCR has been produced for only Building 771/774, not the cluster buildings
- 8 4 4 In-Process Characterization - This section identifies work authorization documents What are the site/building procedures which require generation of these documents (Radiological Control Manual, Authorization Basis, DOE Orders, etc)? The DOP must clearly identify the governing documents along with a brief description of the significant requirements of the documents
- 9 4 4 In-Process Characterization - Revise the second to last sentence in this section to read " further characterization is completed to verify the effectiveness of the decommissioning work efforts in accordance with the DQO process and MARSSIM "
- 10 4 4 Slab/Under Building Characterization - modify the first sentence to read "This sampling and analysis will be conducted to characterize and rank the remaining building slab and under building contamination "
- 11 4 4 Independent Review of Final Building Survey - add language to this section which acknowledges selection of the independent contractor by DOE and/or CDPHE Why is there no independent review identified for material to be released?
- 12 4 4 Final Building Survey - Revise the second paragraph, third sentence to read "A Sampling and Analysis Plan, to be approved by CDPHE, will be developed in accordance with MARSSIM "
- 13 4 4 1 1 First paragraph, second sentence define applicable site procedures
- 14 4 4 1 1 First paragraph, third sentence this sentence should be revised to state that personnel will be trained per the requirements of the referenced/approved documents, and will follow the referenced/approved procedures

- 15 4 4 2 Chemical Characterization - will each set have its own sampling and analysis plan (SAP) or is there a building-wide SAP? Does the Building 771 waste management plan identify the criteria and process? If so, provide a copy
- 16 4 4 2 1 Second paragraph, fourth sentence clarify that personnel will be trained per the requirements of the referenced/approved documents, and will follow the referenced/approved procedures
- 17 4 4 2 2 &
4 4 2 4 Provide a map for the areas within Building 771 suspected of Beryllium and/or PCB contamination
- 18 4 4 2 Copies of the written procedure(s) for the sampling and analysis of lead, PCBs, Beryllium and any other suspected chemical contaminant must be included in this DOP. In the event these documents have not been prepared, the Site shall submit these documents for incorporation into this DOP via a modification under RFCA
- 19 4 4 2 4 Second paragraph, second sentence clarify the statement, "OSHA guidelines will be implemented as appropriate to minimize worker exposure to PCBs " Specifically, define what procedure(s) establish appropriate guidelines
- 20 4 6 1 Last paragraph, modify first sentence to read " waste associated with that closure activity is remediation waste with exception of liquids/sludges "
- 21 4 6 2 2 1 Last paragraph, first sentence this statement is not necessarily true and should therefore be deleted
- 22 4 6 2 2 2 This section needs to be significantly expanded. The overall strategy for conducting readiness evaluations, management reviews, etc. must be clearly identified, as well as how the LRA will participate in these reviews (see Comment 1). In addition, do the two documents identified, the Activity Screening Process and the Readiness Determination Manual, clearly describe the criteria for performing a readiness evaluation, management review, etc. or do they allow the building to prescribe the type of evaluation on a case-by-case basis? How does this process impact the activities described in this DOP (e.g., will each set require a readiness evaluation, what will a readiness evaluation include for each work set, are all IWCPs, RWPs, etc. reviewed during this evaluation, who is responsible for coordinating and ultimately concluding this evaluation, and typically what is the timeframe for completing this evaluation prior to initiating work)? This information needs to be included in the DOP
- 23 4 6 2 2 3 First paragraph, last sentence modify to read "As discussed in section 4 6 1, waste generated from RCRA closures conducted under this DOP can be managed as remediation waste with the exception of liquids and sludges "
- 24 4 6 2 2 4 1 Second paragraph, last sentence - have EPA and/or CDPHE been provided a copy of the ARF? Why must the ARF be approved at the signing of the DOP?
- 25 4 7 3 Is the surface contamination housekeeping limit for Beryllium the same value used as the free-release limit?

- 26 4 8 Figure 4-2 Project Approach Flowchart - modify the flowchart to include the readiness evaluation process which should follow "develop detailed plan" and precede "implement detailed plan" In addition, modify the flowchart to include "regulator involvement"
- 27 5 1 Provide a copy of the Preliminary Hazard Analysis in this DOP
- 28 5 3 2 Include a statement in this section that reflects how these documents will be incorporated into the Integrated Work Control Package Development Process (Appendix 5)
- 29 6 First paragraph, second sentence - elaborate on the statement, " both Deactivation activities associated with a D&D workset and Decommissioning activities will be remediation waste and will be managed as CERCLA waste " What deactivation activities are included in this statement? This statement appears to be inconsistent with RFCA paragraphs 71 and 81 Hazardous waste must be managed in accordance with the RCRA unless they are generated as a result of a decommissioning activity
- 30 6 7 CDPHE has been provided a copy of SSOC's Economic Disposal Plan (EDP) for Building 771 Closure Project (DGH-090-98) Is this the document this section is referring to? The Economic Disposal Plan Checklists include several cost estimates associated with dispositioning waste Provide the basis of estimate for the costs identified in the plan How did these estimates compare with actual costs associated with the Line 30 removal? Were on-site storage costs included in the plan? Why weren't WIPP packaging, characterization, and disposal costs included in the EDP checklist?
- 31 6 8 Modify the first bullet In addition, as a result of the WIPP facility currently not approved to accept TRU/TRM waste, how does this impact the activities included in this DOP?
- 32 6 12 First paragraph, last two sentences delete and add the following language "Non-mixed hazardous remediation wastes will be shipped off-site within one year of generation Mixed hazardous remediation wastes generated by this project will meet Federal Facilities Compliance Act requirements per RFCA paragraph 12."
- 33 6 12 Fourth paragraph - Add this sentence after the second sentence "Applicable wastes may be managed as non-hazardous debris provided they have satisfied the requirements of 6 CCR 1007-3, Part 268 "
- 34 7 The statements throughout this section that mention "information is being provided to satisfy the permit waiver requirement" should be removed Sufficient information has not been included in this DOP, as a result the permit waiver requirements have not been satisfied
- 35 7 2 Second paragraph, seventh sentence - modify this sentence to read "For TUs, the appropriate requirements from 6 CCR 1007-3, including inspection frequency will be negotiated with CDPHE prior to use "
- 36 7 3 First paragraph, second sentence - modify this sentence to read "If treatment is required in a TU, the appropriate requirements from 6 CCR 1007-3 will be negotiated with the LRA Once an agreement has been reached, the LRA will be notified at least seven days prior to treatment "

- 37 7 4 Third paragraph, first sentence - delete the phrase "until they are placed into the Building 891 Wastewater Treatment Unit Headworks "
- 38 7 8 Why is DOE Order 5820 2A identified as a To Be Considered?
- 39 Table 7-1 Add 6 CCR 1007-3, Part 264, Subpart J to this table as an applicable requirement
- 40 Table 7-1 This table currently includes air ARARs for demolition even though the DOP currently doesn't include demolition Approval of this DOP with air ARARs included absent any distinct plans for demolition is inappropriate at this time
- 41 Appendix 5 IWCP Process Flow - incorporate "regulator involvement" in this process In addition, for the step "work package round tabled and approved", is this part of the readiness assessment and/or management review process? Elaborate on this step